

**From:** Pamela Campbell [[mailto:campbell\\_pm@telus.net](mailto:campbell_pm@telus.net)]

**Sent:** Tuesday, February 04, 2014 2:15 PM

**To:** Rice, Cody

**Subject:** Status of EPA's Lead Wheel Weights Analysis: Request for update to inform Environment Canada study

Dear Cody,

I am working with Environment Canada assessing the technical issues and cost/benefits associated with a proposed reduction in uses of lead wheel weights in Canada (see attached letter). I am very interested in US EPA's work in this area. I was just talking with Mark Henshall about the status of EPA's work in this area and he suggested I contact you as he is no longer working on the lead wheel weights file. I would be very grateful if you could provide me with an update on the status of US EPA's analysis on lead wheel weights. Could you tell me whether or not EPA plans to move ahead with risk management measures for lead wheel weights? And, if risk management measures are to be introduced, could you give an idea of the potential timing for their introduction? In this regard, industry stakeholders (particularly wheel weight manufacturers) have indicated to us that they would welcome a lead wheel weight phase-out – and ideally would like to see a coordinated US/Canada phase-out.

Some further background on our work: Environment Canada released a Proposed Risk Management Strategy for Lead in July 2011. As a follow-up to this we conducted a Technical and Socio-Economic Background Study on several uses of lead including lead wheel weights. The study on lead wheel weights included: (1) collection of socio-economic information on manufacturers, importers, users, recoverers and recyclers in Canada (international context also provided), (2) information on product categories, (3) a lifecycle profile, and a (4) review of the alternatives (including assessment of relative costs, performance, environmental performance, availability, market barriers etc.). The purpose of the study was to provide Environment Canada with objective and thorough analyses that would be used in their development of an appropriate risk-management strategy for lead. As a follow-up, we are now conducting a *Cost Benefit Analysis*. If EPA has completed a cost-benefit analysis in this area we would be very interested to see your analysis and conclusions – if at all possible. All studies and information shared would be kept confidential.

Thank you in advance for your help.

I look forward to hearing from you.

Regards,  
Pamela Campbell

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